

From: [Fugh, Justina](#)
To: [Weiss, Steven](#)
Cc: [Sisco, Debby](#); [Ross, Margaret](#)
Subject: RE: Integrity.gov: Report Assigned
Date: Friday, February 8, 2019 11:30:00 AM

Hi there,

Well, I'm not sure why you got the email either since we have no record of your ever filing a new entrant report nor that you were assigned a report. I used a decoder ring on the timeline you sent us:

- Branch Chief from 11/1/18 to present
- AD Acting Deputy Director from 6/1/18 to 11/1/18 (5 months) – not an SES position
- AD Acting Director from 11/1/18 to 1/22/18 (~3 months) – although this position is an SES position, do you meant 11/18 to 1/22/19? If so, then you are NOT required to file a public financial disclosure report with us because you served for fewer than 60 days in CY 2018
- AD Acting Deputy Director from 1/22/18 to 4/27/18 (3 months) -- not an SES position
- AD Acting Director from 4/27/18 to 5/25/18 (1 month) – too few days served so NOT required to file a public financial disclosure report
- AD Acting Deputy Director from 5/25/18 to 9/31/18 (4 months) -- not an SES position

So you do NOT need to file a public report. I've copied Margaret Ross so that she can remove the assignment and delete you from our rolls. How you showed up, I don't know!

Justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Weiss, Steven
Sent: Wednesday, February 06, 2019 9:07 AM
To: Sisco, Debby <Sisco.Debby@epa.gov>; ethics <ethics@epa.gov>
Subject: RE: Integrity.gov: Report Assigned

- BC from 11/1/18 to present
- AD Acting Deputy Director from 6/1/18 to 11/1/18 (5 months)
- AD Acting Director from 11/1/18 to 1/22/18 (~3 months)
- AD Acting Deputy Director from 1/22/18 to 4/27/18 (3 months)
- AD Acting Director from 4/27/18 to 5/25/18 (1 month)
- AD Acting Deputy Director from 5/25/18 to 9/31/18 (4 months)

-----Original Message-----

From: Sisco, Debby
Sent: Wednesday, February 06, 2019 7:55 AM
To: Weiss, Steven <Weiss.Steven@epa.gov>; ethics <ethics@epa.gov>
Subject: RE: Integrity.gov: Report Assigned

Steve,

What were the dates of your acting position?

Debby Sisco

Ethics Officer and Special Assistant to the Director Office of Pesticide Programs (7501P) US

Environmental Protection Agency 4th floor – 4241 Potomac Yard South
(office: 703 308-8121; Mobile: 571 317-4823)

-----Original Message-----

From: Weiss, Steven

Sent: Tuesday, February 5, 2019 4:45 PM

To: ethics <ethics@epa.gov>

Cc: Sisco, Debby <Sisco.Debby@epa.gov>

Subject: RE: Integrity.gov: Report Assigned

I think received this by mistake based on a detail position that I served in last year as Acting Director for the Antimicrobials Division (AD). I am currently a Branch Chief in AD. Please confirm if I need to complete the report.

Thanks,

-Steve

Steven H. Weiss

Antimicrobials Division

Office of Pesticide Programs

US Environmental Protection Agency

Weiss.Steven@epa.gov

(703)308-8293

-----Original Message-----

From: Integrity.gov <notifications@integrity.gov>

Sent: Wednesday, February 07, 2018 7:07 PM

To: Weiss, Steven <Weiss.Steven@epa.gov>

Subject: Integrity.gov: Report Assigned

Greetings! OGC/Ethics has assigned you a public financial disclosure report in INTEGRITY. Please follow the directions below.

NEW ENTRANT REPORT

You are entering a position at EPA that requires you to file the public financial disclosure report, the OGE 278e. If this is your first time completing the report, then please understand that it requires A LOT of specific information. If you previously reported your financial holdings on the OGE-450 confidential financial disclosure form, then be advised that you will have to report MUCH MORE information and in greater detail than you have done previously. As a new entrant filer, you will provide specific information about your own and imputed assets (including diversified mutual funds that are not reportable on the OGE 450), retirement plans, trusts, non-term life insurance) and report how much those assets are worth (i.e., the valuation), and the type and amount of income earned for those assets (even if in a tax-deferred account).

INTEGRITY ACCESS REMINDERS

YOU NEED AN UP-TO-DATE internet browser. INTEGRITY requires Internet Explorer 10 and above, Firefox 31.0 or greater, Safari 5 or greater, Google Chrome 36.0 or greater.

Go to <https://www.integrity.gov> . INTEGRITY will then route you to the OMB's secure system, MAX.gov, for authentication. We already established accounts in MAX.gov and INTEGRITY for you. Your current MAX.gov ID is your EPA email address. If you are departing EPA, then you need to write to ethics@epa.gov and provide a non-EPA email address. We have to update your accounts for you that aren't based on the EPA email address.

If you've never used MAX.gov, then you'll be prompted to create a password. If you have used MAX.gov before, then use the password you already created to access your account (or reset that password if you forgot or it's now expired).

INTEGRITY saves partially completed forms for you so you can return anytime you want.

For problems with MAX.gov, contact them directly for assistance at: MAXSupport@max.gov You can also call them at 202-395-6860

INTEGRITY LOG-IN REMINDERS

When you first log-in to INTEGRITY, you will see a "contact information" screen to review and complete. At the bottom, indicate that you have read and agree to the User Agreement, then click Submit to view your account. You'll then land on a "My Tasks" dashboard. That's where you'll see the task assigned you (i.e., your new entrant OGE-278e).

INTEGRITY has helpful resource tools, but you need to be logged on to see them. To learn more about INTEGRITY, check out the "For Filers" tab on the INTEGRITY resource page. If you are having any problems with INTEGRITY itself, send an email to ethics@epa.gov.

TRANSACTION REMINDERS

Annual and termination public filers must report on certain transactions. Some transactions must be reported periodically (e.g., stocks, bonds), while mutual fund transactions must be reported annually.

If you used INTEGRITY to file your 278Ts, then you can pre-populate your annual or termination reports. Otherwise, you have to enter those transactions yourself.

For additional guidance about filling out the OGE-278 annual and OGE-278-T periodic financial disclosure form, see: <https://www2.oge.gov/Web/278eGuide.nsf> or the OGC/Ethics intranet site at <http://intranet.epa.gov/ogc/Integrity/Landingpage.html>.

From: [Overstreet, Anne](#)
To: [Fugh, Justina](#)
Subject: RE: Hello from EPA Ethics (but, just wait, it gets worse)
Date: Wednesday, July 20, 2022 7:13:21 AM
Attachments: [image001.jpg](#)

Hi Justina, I wanted to let you know that I completed the filing. Let me know if there is anything else needed.

Thanks!

Anne



Anne Overstreet, Acting Director
Biological and Economic Analysis Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
(202) 566-2425
Overstreet.anne@epa.gov
<http://www.epa.gov/pesticides>

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Monday, July 11, 2022 9:54 PM
To: Overstreet, Anne <overstreet.anne@epa.gov>
Subject: Hello from EPA Ethics (but, just wait, it gets worse)

Hi there,

I'm sorry to be the bearer of aggravating news, but I understand that you have been detailed into an SES position since (gulp) 5/22/22, but we haven't yet notified you of your financial disclosure obligations. Well, welcome to the wonderful world of public financial disclosure reporting! Even though you are still a GS employee, we expect that you'll be acting for more than 60 days in a calendar year. Thus, you are required by the Ethics in Government Act of 1978 to file the Public Financial Disclosure Report.

DEADLINE FOR SUBMITTING THE REPORT

Technically, your "new entrant" report is due no later than 30 days from the date your detail started which was 5/22/22, but we didn't notify you. I've given you a 90 day extension of time so your report is due 9/19/22.

THE FINANCIAL DISCLOSURE REPORT, OGE-278e

EPA uses an electronic filing system (www.INTEGRITY.gov) for the public financial disclosure reports that is operated and secured by the U.S. Office of Government Ethics (OGE). You are required by law to complete the form, and we will use it to determine whether you have any financial conflicts of interest or other ethics concerns. We created an account for you in INTEGRITY and have assigned you a "new entrant" report. Your filer category is "career SES" and your filer status is "other" because you're on detail. For help in INTEGRITY, check out the OGE [Public Financial Disclosure Guide](#). The email from INTEGRITY.gov will provide you with specific instructions to log into the federal government's max.gov site, the gateway to INTEGRITY. If you don't receive your account notification, then please check your clutter box for messages from INTEGRITY.gov or go directly to www.INTEGRITY.gov and contact their help desk.

There are several important things to know about the OGE-278e: (1) it is a public form (which

means that anyone can ask for a copy of your form, and we must provide it, even without your prior permission); (2) you have to fill it out every year you are in this position; and (3) when you leave the acting position, you have to file a termination report (so remember to notify us). There is also a late filing fee of \$200 but I'll of course waive that provided you aren't unreasonably tardy in filing now that you know about the requirement. That said, there are also civil and criminal penalties for failure to file at all or for inaccurate reporting.

YOUR REPORTING PERIODS FOR THE NEW ENTRANT REPORT

For the New Entrant (NE) report, you will complete the sections in RED below and apply the following reporting periods:

PART	TITLE	REPORTING PERIOD
1	Filer's Positions Held Outside United States Government	Preceding Two Calendar Years to Filing Date
2	Filer's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year to Filing Date*
3	Filer's Employment Agreements and Arrangements	As of Filing Date
4	Filer's Sources of Compensation Exceeding \$5,000 in a Year	Preceding Two Calendar Years to Filing Date
5	Spouse's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year to Filing Date*
6	Other Assets and Income	Preceding Calendar Year to Filing Date*
7	Transactions	Not applicable for the NE report
8	Liabilities	Preceding Calendar Year to Filing Date*
9	Gifts and Travel Reimbursements	Not applicable for the NE report

*For example, if today is March 3, 2021, the reporting period would run from January 1, 2020, to March 3, 2021. When valuing assets and liabilities, you may choose any date that is fewer than 31 days before the filing date.

ANSWER ANY FOLLOW UP QUESTIONS WITHIN 14 DAYS

We will review your report as quickly as possible. If we have any questions, then we will notify you. At that point, you will have 14 calendar days to respond and resubmit your report back to us with any necessary changes.

REPORTING TRANSACTIONS

By law, as soon as you started this detail (on 5/22/22), you were considered a public financial disclosure filer who is subject to the Ethics In Government Act, as amended by the STOCK Act. Not only must you report a lot more information than you had to on your confidential report, but now you are also required to report any purchase, sale or exchange of stocks, bonds, commodities futures or other forms of securities when the amount of the transaction exceeds \$1000. You will have to use INTEGRITY to disclose reportable transactions within 30 days of receiving notification of the transaction, but not later than 45 days after the transaction occurs. You will have to report transactions that occur within brokerage accounts, managed accounts, or other investment vehicles that you own or jointly own with your spouse or another person, as well as transactions of your spouse or dependent children. For a comprehensive review of reportable transactions, see [EPA Ethics Advisory 2012-03](#) and our revised attached chart. Remember, you are responsible for reporting transactions, even if you have a managed account, and you will be fined for a tardy periodic transaction report going

forward. If you had any transactions that should have been reported between 5/22/22 and today, then you will still have to report them, but you will not be fined for those “tardy” transaction reports.

HELPFUL HINTS FOR FILLING OUT THE FORM

- This is a wretched and exacting form, so just know that you will have to report way more information that you did on the confidential financial disclosure report.
- You will get three different places to report assets: filer’s employment-related assets and income, spouse’s employment related assets and income, and other assets and income. So you are reporting the assets for yourself, your spouse and your dependent children. We don’t really care where you report your assets, just that you do report them all someplace.
- You must include any investment asset that is worth more than \$1000. Include any income from any source that exceeded \$200 during the reporting period (including outside jobs or hobbies, rental income). Include any cash/savings accounts that have more than \$5000.
- Enter each asset separately. Don't lump items together on one line. Be sure to provide the valuation of the asset AND the amount of the income. For assets that aren’t mutual funds, you also have to report the type of income (e.g., dividends, cap gains).
- For 401(k) or IRA plans, provide the name of each of the underlying assets. Don't just write "Vanguard IRA" or "mutual fund." You must specify each asset separately and give the valuation but, for these assets in tax deferred instruments, you do not need to provide the amount of income accrued.
- Do not report your federal salary, your spouse’s federal salary, or Thrift Savings Plan information
- If you (not your spouse) have any earned income (e.g., outside job, paid pension), you have to report the actual amount of that income.
- If your spouse works outside of federal service, then include your spouse's employer but not the amount of your spouse's salary. If you are not legally married, do not report your significant other's employer.
- Don't forget to include any life insurance policies (whole life or variable life) as well as the underlying investments, but do not report term life insurance.
- If you have nothing to report in a section, be sure to click the “nothing to report” button.
- Remember to check out the Office of Government Ethics’ [Public Financial Disclosure](#)

[Guide](#) or to contact OGC/Ethics for help.

OTHER ETHICS REQUIREMENTS FOR YOU

HATCH ACT

Because you are still a GS employee, you will remain “less restricted” under the Hatch Act. You should familiarize yourself with the Hatch Act as it affects you, and from the EPA intranet, can gain a good overview by reviewing our online [Hatch Act training course](#) or by referring to our attached handy chart that reminds you of your restrictions.

ETHICS TRAINING

As a public financial disclosure filer, you must take one hour of ethics training this year.

If you have any questions regarding this message or your obligations, then please contact me directly.

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 | phone 202-564-1786

When to Report Transactions

DUE DATE: The earlier of the following: 30 Days from Notification or 45 Days from Transaction

	Periodic Transaction Report	Annual and/or Termination Report
Investment Assets	Report on the OGE 278-T?	Report on Part 7 of the OGE 278e?
Transactions of \$1,000 or less		
• Any asset in which the transaction amount is \$1,000 or less regardless of the type of asset or who owns the asset	No	No
Your investment assets (or jointly held)		
• Your stocks	Yes	Yes
• Your bonds (except U.S. Treasury securities)	Yes	Yes
• Your commodity futures	Yes	Yes
• Your other investment securities	Yes	Yes
• Assets listed above in your (joint) brokerage accounts, (joint) managed accounts, IRAs, other retirement accounts, and/or other (joint) investment vehicles	Yes	Yes
Your spouse's investment assets		
• Spouse's stocks	Yes	Yes
• Spouse's bonds (except U.S. Treasury securities)	Yes	Yes
• Spouse's commodity futures	Yes	Yes
• Spouse's other investment securities	Yes	Yes
• Assets listed above in spouse's <u>own</u> brokerage account, managed accounts, IRAs, other retirement accounts, and/or other investment vehicles	Yes	Yes
Your dependent child's investment assets		
• Dependent child's stocks	Yes	Yes
• Dependent child's bonds (except U.S. Treasury securities)	Yes	Yes
• Dependent child's commodity futures	Yes	Yes
• Dependent child's other investment securities	Yes	Yes
• Assets listed above in dependent child's <u>own</u> brokerage account, IRAs, and/or other investment vehicles	Yes	Yes
Other investment assets irrespective of ownership		
• Real Property	No	Yes ¹
• Mutual funds, exchange traded funds, index funds and/or other "excepted investment funds" ²	No	Yes
• Any asset in which the transaction amount is \$1,000 or less	No	No
• Cash accounts (deposits and/or withdrawals)	No	No
• Money market accounts	No	No
• Money market funds	No	No
• Certificates of deposits	No	No
• US Treasury Securities (e.g., T bills, Treasury bonds, U.S. savings bonds)	No	No
• Federal Government Retirement Accounts (e.g., Thrift Savings Plan)	No	No
• Life insurance and annuities	No	No
• Collectibles	No	No
• Assets held within an excepted trust ³	No	No
• Transfer of assets between you, your spouse, and your dependent children	No	No

¹ Do not report the purchase or sale of your personal residence on Part 7 unless you rent it out at any time during the reporting period.

² To be an excepted investment fund (EIF), the asset must be:

- (a) widely held (more than 100 participants),
- (b) independently managed – arranged so that you neither exercise control nor have the ability to exercise control over the financial interests held by the fund, and
- (c) publicly traded (or available) or widely diversified.

Managed accounts, investment clubs, trusts, 529 accounts, brokerage accounts, and individual retirement accounts (IRAs) are not excepted investment funds in and of themselves. It may be that individual assets held within these types of investment vehicles may qualify as EIFs if, for example, your IRA holds a publicly-traded mutual fund. But the fact that you have a managed account does not absolve you of your reporting requirements. That account is legally owned by you, and you're responsible for its assets and reporting transactions. If you have questions, contact ethics@epa.gov.

³ OGC/Ethics must determine that your trust qualifies as an “excepted trust.” For help, email ethics@epa.gov.

Political Activities and Federal Employees

The Hatch Act, enacted in 1939, was amended in 1993 and 2012. It regulates the political activities of executive branch employees, excluding the President and Vice President. The following table summarizes what political activities EPA employees can and cannot do based on their appointment. Note: Public Health Service officers must adhere to 45 CFR Part 73, Subpart F, which is most similar to the Career SES/ALJ column.

Political activity means an activity “directed toward the success or failure of a political party, a candidate for partisan political office, or a partisan political group.”

Type of Activity	PAS*	Non-Career SES, Schedule C*, Title 42, SL/ST, AD*, GS, Other	Career SES, ALJs
Personal (off premises and off duty)			
Express support for or opposition to a political candidate when off duty	Yes	Yes	Yes
Run as a partisan candidate for nomination or office in a partisan election	No	No	No
Solicit and accept contributions for your campaign in a non-partisan election	Yes	Yes	Yes
Solicit a contribution from a member of your union	N/A	Yes	N/A
Work a phone bank asking individuals to volunteer	Yes	Yes	No
Campaign on behalf of a candidate in a partisan election	Yes	Yes	No
Be active on behalf of a candidate at political rallies or meetings	Yes	Yes	No
Attend political rallies and meetings	Yes	Yes	Yes
Contribute money to political organizations	Yes	Yes	Yes
Work in non-partisan voter registration drives	Yes	Yes	Yes
Work in partisan voter registration drives	Yes	Yes	No
Register and vote	Yes	Yes	Yes
Sign a nominating petition	Yes	Yes	Yes
Distribute campaign material in a partisan election	Yes	Yes	No
Work as an election judge, poll watcher, clerical worker on election day	Yes	Yes	Yes
Drive people to polling station on behalf of a campaign	Yes	Yes	No
Affecting Official Resources			
Use office time for political activity	Yes; IG-No	No	No
Use official space for political activity in general	Yes; IG-No	No	No
Fundraising			
Attend a political fundraiser	Yes	Yes	Yes
Solicit, accept or receive political contributions in general	No	No	No
Solicit or receive a political contribution on government premises	No	No	No
Plan or organize a political fundraiser when off duty	Yes	Yes	No
Sponsor, host, or allow your name as sponsor/host for a political fundraiser	No	No	No
Serve drinks or check coats at a political fundraiser	Yes	Yes	No
Speak at a partisan fundraiser without appealing for money	Yes	Yes	No
Allow only your name to be listed as speaker on fundraising invitation	Yes	Yes	No

*PAS = Political Appointee Confirmed by the Senate; Schedule C = political appointees not confirmed by Senate; AD = Administratively Determined; SES = Senior Executive Service

From: [Overstreet, Anne](#)
To: [Fugh, Justina](#)
Subject: RE: Integrity.gov: Report Returned
Date: Thursday, August 18, 2022 7:43:46 AM
Attachments: [image001.jpg](#)
[image002.png](#)

Thanks for the help, Justina. It's complete.
Anne



Anne Overstreet, Acting Director
Biological and Economic Analysis Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
(202) 566-2425
Overstreet.anne@epa.gov
<http://www.epa.gov/pesticides>

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Wednesday, August 17, 2022 5:06 PM
To: Overstreet, Anne <overstreet.anne@epa.gov>
Subject: RE: Integrity.gov: Report Returned

Hi there,

You still have control over your report, which is why you are getting the reminders. But as I look at your report, I see that there is still one remaining issue (see below).

Here are the questions I posed in your report:

Comments of Reviewing Officials (not publicly displayed on report):

PART	#	REFERENCE	COMMENT
			(07/25/22, Fugh, Justina): Hi -- thanks for tackling your report. (b) (6)
N/A	N/A	General	Thanks!
N/A	N/A	General	(08/08/22, Overstreet, Jean A): (b) (6) . Thanks for the confirmation.
6.	1	(b) (6)	(07/25/22, Fugh, Justina): (b) (6)

Please make the adjustment to this entry.

Please adjust how you refer to the bank, and then *submit the report back to me*. To do so, look at the left hand menu and click on "submit report." Wait for that page to load, then scroll down to click on the "attestation" button and then you will be able to submit the report back to us.

An Ink Drawing



Thanks,

Justina

Justina Fugh (she/her) | Director Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North William Jefferson Clinton Federal Building | Washington DC 20460 | phone 202-564-1786

-----Original Message-----

From: Overstreet, Anne <overstreet.anne@epa.gov>

Sent: Tuesday, August 16, 2022 10:35 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: FW: Integrity.gov: Report Returned

Hi Justina, I got another message to complete the report but I've updated as you suggested and have nothing else to add. I saved the file so I'm not sure what else would be needed.

Best,

Anne

Anne Overstreet, Acting Director

Biological and Economic Analysis Division Office of Pesticide Programs U.S. Environmental Protection Agency

(202) 566-2425

Overstreet.anne@epa.gov

<http://www.epa.gov/pesticides>

-----Original Message-----

From: Integrity.gov <notifications@integrity.gov>

Sent: Tuesday, August 16, 2022 10:00 AM

To: Overstreet, Anne <overstreet.anne@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Integrity.gov: Report Returned

Dear Overstreet, Jean A,

This is your gentle reminder that Fugh, Justina requested that you amend your 2022 New Entrant Report filed 7/19/2022. You were given 14 days to make the changes and submit the report back to us. Please make the necessary changes as soon as possible! Access your report at (b) (6)

(b) (6)

If you have any questions, send a note to ethics@epa.gov. For additional help with the report, see: [https://gcc02.safelinks.protection.outlook.com/?](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww2.oge.gov%2FWeb%2F278eGuide.nsf&data=05%7C01%7Coverstreet.anne%40epa.gov%7Cfdb04184849e42f7fc1508da7f8fa5fd%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637962552189833537%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=ip0NH2vKdchY8NSNI2KMSnIJ241nyLWwdal%2B2y5bEkc%3D&reserved=0)

[url=https%3A%2F%2Fwww2.oge.gov%2FWeb%2F278eGuide.nsf&data=05%7C01%7Coverstreet.anne%40epa.gov%7Cfdb04184849e42f7fc1508da7f8fa5fd%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637962552189833537%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=ip0NH2vKdchY8NSNI2KMSnIJ241nyLWwdal%2B2y5bEkc%3D&reserved=0](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww2.oge.gov%2FWeb%2F278eGuide.nsf&data=05%7C01%7Coverstreet.anne%40epa.gov%7Cfdb04184849e42f7fc1508da7f8fa5fd%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637962552189833537%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=ip0NH2vKdchY8NSNI2KMSnIJ241nyLWwdal%2B2y5bEkc%3D&reserved=0)

From: [Fugh, Justina](#)
To: [Reaves, Elissa](#)
Subject: Welcome to your public financial disclosure obligations!
Date: Tuesday, June 25, 2019 10:22:00 PM
Attachments: [When to Report Transactions on the OGE 278 and Part 7 - May 2019.docx](#)
[Hatch Act chart February 2017.docx](#)

Hi there,

Welcome to the wonderful world of public financial disclosure reporting! I understand that you have been acting in the position of [Director, Pesticides Reevaluation Division in OPP, OCSPP](#), which is a career SES position. Congratulations! Because this position is designated as SES (even though, yes, we know you are still in the GS), and you'll occupy it for more than 60 days in a calendar year, you are required by the Ethics in Government Act of 1978 to file the Public Financial Disclosure Report because you are acting in the position. Technically, your "new entrant" report was due no later than 30 days from the date your detail was made effective, which was [6/9/19](#), but we will set your due date 30 days from now. Your report will be due [7/25/19](#). As a supervisor, you are obliged by [5 CFR § 2638.103](#) to set an example to model ethical behavior for your staff. The Ethics Office is here to help you if you have any questions!

EPA uses an entirely electronic filing system (called INTEGRITY) for the public financial disclosure reports. This system is operated and secured by the Office of Government Ethics. You are required by law to complete the form, and we will use it to determine whether you have any financial conflicts of interest or other ethics concerns. There are several important things to know about the OGE-278e: (1) it is a public form (which means that anyone can ask for a copy of your form, but Congress repealed the requirement for public posting to the internet); (2) you have to fill it out every year you are in this position; (3) when you leave the acting position or EPA, you will have to file a termination report (we'll remind you); and (4) you will be subject to a late filing fee of \$200 for not filing your report timely. Plus, there are also civil and criminal penalties for failure to file at all or for inaccurate reporting.

THE FINANCIAL DISCLOSURE REPORT, OGE-278e

We created an account for you in INTEGRITY and have assigned you a "new entrant" report. If you are asked to provide an address, use the EPA business address. Do not enter your personal home address. Your filer category is "Career SES." For help in INTEGRITY, check out the information on the OGC/Ethics website at <http://intranet.epa.gov/ogc/Integrity/Landingpage.html>. The email from INTEGRITY.gov will provide you with specific instructions to log into the federal government's max.gov site, the gateway to INTEGRITY. If you don't receive your account notification within three days, then please check your clutter box for messages from INTEGRITY.gov, or contact ethics@epa.gov so that we can follow up.

DEADLINE FOR SUBMITTING THE FORM

INTEGRITY will give you 30 days to complete the form. If you need additional time, you must contact me directly. There is a limit to how much additional time we can give you before late fees kick in, so please pay attention to this requirement.

HELPFUL HINTS FOR FILLING OUT THE FORM

- This is a wretched and exacting form, so just know that you will have to report way more information that you did on the confidential financial disclosure report.
- You will get three different places to report assets: filer's employment-related assets and income, spouse's employment related assets and income, and other assets and income. So you are reporting the assets for yourself, your spouse and your dependent children. We don't really care where you report your assets, just that you do report them all someplace.
- You must include any investment asset that is worth more than \$1000. Include any income from any source that exceeded \$200 during the reporting period (including outside jobs or hobbies, rental income). Include any cash/savings accounts that have more than \$5000.
- Enter each asset separately. Don't lump items together on one line. Be sure to provide the valuation of the asset AND the amount of the income. For assets that aren't mutual funds, you also have to report the type of income (e.g., dividends, cap gains).
- For 401(k) or IRA plans, provide the name of each of the underlying assets. Don't just write "Vanguard IRA" or "mutual fund." You must specify each asset separately and give the valuation.
- Do not report your federal salary, your spouse's federal salary, or TSP
- But if you (not your spouse) have any earned income (e.g., outside job, paid pension), you have to report the actual amount of that income.
- But if your spouse works outside of federal service, then include your spouse's employer but not the amount of your spouse's salary. If you are not legally married, do not report your significant other's employer.
- Don't forget to include any life insurance policies (whole life or variable life) as well as the underlying investments, but do not report term life insurance.
- If you have nothing to report in a section, be sure to click the "nothing to report" button

OTHER ETHICS REQUIREMENTS FOR YOU

STOCK ACT

Because you are required to file the form, you are also now subject to the STOCK Act. You are required to report any purchase, sale or exchange of stocks, bonds, commodities futures or other forms of securities when the amount of the transaction exceeds \$1000. Use INTEGRITY to disclose reportable transactions within 30 days of receiving notification of the transaction,

but not later than 45 days after the transaction occurs. You will have to report transactions that occur within brokerage accounts, managed accounts, or other investment vehicles that you own or jointly own with your spouse or another person, as well as transactions of your spouse or dependent children. For a comprehensive review of reportable transactions, see EPA Ethics Advisory 2012-03 at http://intranet.epa.gov/ogc/ethics/Ethics_Advisory_2012-03.pdf and our revised chart, also attached.

HATCH ACT

Because you are still a GS employee, you will remain “lesser restricted” under the Hatch Act. You should familiarize yourself with the Hatch Act as it affects you, and from the EPA intranet, can gain a good overview by reviewing our online [Hatch Act training course](#) or by referring to our attached handy chart that reminds you of your restrictions.

ETHICS TRAINING

As a public financial disclosure filer, you will be reminded by OGC/Ethics to take your one-hour ethics training in 2019 in FedTalent. If you thought you were nagged before, just wait for what happens when I’m the one who is keeping track of your ethics housekeeping requirements!

Cheers,

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

When to Report Transactions

DUE DATE: The earlier of the following: 30 Days from Notification or 45 Days from Transaction

	Periodic Transaction Report	Annual and/or Termination Report
Investment Assets	Report on the OGE 278-T?	Report on Part 7 of the OGE 278e?
Transactions of \$1,000 or less		
• Any asset in which the transaction amount is \$1,000 or less regardless of the type of asset or who owns the asset	No	No
Your investment assets (or jointly held)		
• Your stocks	Yes	Yes
• Your bonds (except U.S. Treasury securities)	Yes	Yes
• Your commodity futures	Yes	Yes
• Your other investment securities	Yes	Yes
• Assets listed above in your (joint) brokerage accounts, (joint) managed accounts, IRAs, other retirement accounts, and/or other (joint) investment vehicles	Yes	Yes
Your spouse's investment assets		
• Spouse's stocks	Yes	Yes
• Spouse's bonds (except U.S. Treasury securities)	Yes	Yes
• Spouse's commodity futures	Yes	Yes
• Spouse's other investment securities	Yes	Yes
• Assets listed above in spouse's <u>own</u> brokerage account, managed accounts, IRAs, other retirement accounts, and/or other investment vehicles	Yes	Yes
Your dependent child's investment assets		
• Dependent child's stocks	Yes	Yes
• Dependent child's bonds (except U.S. Treasury securities)	Yes	Yes
• Dependent child's commodity futures	Yes	Yes
• Dependent child's other investment securities	Yes	Yes
• Assets listed above in dependent child's <u>own</u> brokerage account, IRAs, and/or other investment vehicles	Yes	Yes
Other investment assets irrespective of ownership		
• Real Property	No	Yes ¹
• Mutual funds, exchange traded funds, index funds and/or other "excepted investment funds" ²	No	Yes
• Any asset in which the transaction amount is \$1,000 or less	No	No
• Cash accounts (deposits and/or withdrawals)	No	No
• Money market accounts	No	No
• Money market funds	No	No
• Certificates of deposits	No	No
• US Treasury Securities (e.g., T bills, Treasury bonds, U.S. savings bonds)	No	No
• Federal Government Retirement Accounts (e.g., Thrift Savings Plan)	No	No
• Life insurance and annuities	No	No
• Collectibles	No	No
• Assets held within an excepted trust ³	No	No
• Transfer of assets between you, your spouse, and your dependent children	No	No

¹ Do not report the purchase or sale of your personal residence on Part 7 unless you rent it out at any time during the reporting period.

² To be an excepted investment fund (EIF), the asset must be:

- (a) widely held (more than 100 participants),
- (b) independently managed – arranged so that you neither exercise control nor have the ability to exercise control over the financial interests held by the fund, and
- (c) publicly traded (or available) or widely diversified.

Managed accounts, investment clubs, trusts, 529 accounts, brokerage accounts, and individual retirement accounts (IRAs) are not excepted investment funds in and of themselves. It may be that individual assets held within these types of investment vehicles may qualify as EIFs if, for example, your IRA holds a publicly-traded mutual fund. But the fact that you have a managed account does not absolve you of your reporting requirements. That account is legally owned by you, and you're responsible for its assets and reporting transactions. If you have questions, contact ethics@epa.gov.

³ OGC/Ethics must determine that your trust qualifies as an “excepted trust.” For help, email ethics@epa.gov.

Political Activities and Federal Employees

The Hatch Act, enacted in 1939, was amended in 1993 and 2012. It regulates the political activities of executive branch employees, excluding the President and Vice President. The following table summarizes what political activities EPA employees can and cannot do based on their appointment. Note: Public Health Service officers must adhere to 45 CFR Part 73, Subpart F, which is most similar to the Career SES/ALJ column.

Political activity means an activity “directed toward the success or failure of a political party, a candidate for partisan political office, or a partisan political group.”

Type of Activity	PAS*	Non-Career SES, Schedule C*, Title 42, SL/ST, AD*, GS, Other	Career SES, ALJs
Personal (off premises and off duty)			
Express support for or opposition to a political candidate when off duty	Yes	Yes	Yes
Run as a partisan candidate for nomination or office in a partisan election	No	No	No
Solicit and accept contributions for your campaign in a non-partisan election	Yes	Yes	Yes
Solicit a contribution from a member of your union	N/A	Yes	N/A
Work a phone bank asking individuals to volunteer	Yes	Yes	No
Campaign on behalf of a candidate in a partisan election	Yes	Yes	No
Be active on behalf of a candidate at political rallies or meetings	Yes	Yes	No
Attend political rallies and meetings	Yes	Yes	Yes
Contribute money to political organizations	Yes	Yes	Yes
Work in non-partisan voter registration drives	Yes	Yes	Yes
Work in partisan voter registration drives	Yes	Yes	No
Register and vote	Yes	Yes	Yes
Sign a nominating petition	Yes	Yes	Yes
Distribute campaign material in a partisan election	Yes	Yes	No
Work as an election judge, poll watcher, clerical worker on election day	Yes	Yes	Yes
Drive people to polling station on behalf of a campaign	Yes	Yes	No
Affecting Official Resources			
Use office time for political activity	Yes; IG-No	No	No
Use official space for political activity in general	Yes; IG-No	No	No
Fundraising			
Attend a political fundraiser	Yes	Yes	Yes
Solicit, accept or receive political contributions in general	No	No	No
Solicit or receive a political contribution on government premises	No	No	No
Plan or organize a political fundraiser when off duty	Yes	Yes	No
Sponsor, host, or allow your name as sponsor/host for a political fundraiser	No	No	No
Serve drinks or check coats at a political fundraiser	Yes	Yes	No
Speak at a partisan fundraiser without appealing for money	Yes	Yes	No
Allow only your name to be listed as speaker on fundraising invitation	Yes	Yes	No

*PAS = Political Appointee Confirmed by the Senate; Schedule C = political appointees not confirmed by Senate;
AD = Administratively Determined; SES = Senior Executive Service

ASSET	JUSTINA'S COMMENT	ELISSA'S ANSWER	WHAT TO REPORT?
(b) (6), (b) (3) (A)			

(b) (6), (b) (3) (A)	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Thanks!

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

(b) (6), (b) (3) (A) [Redacted]	[Redacted]	[Redacted]	[Redacted]
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Thanks!
Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Fugh, Justina](#)
To: [Matuszko, Jan](#); [Griffo, Shannon](#)
Subject: discussion about financial disclosure report

Hi there –

We want to talk to you about your financial disclosure report and some of your assets.

Thanks!
Justina

Microsoft Teams meeting

Join on your computer or mobile app

Click here to join the meeting (b) (6)

Or call in (audio only)

(b) (6) United States, Washington DC

Phone Conference ID: (b) (6)

Find a local number <<https://dialin.teams.microsoft.com/556a4b78-4afd-4fe6-b721-1d903e8cdaa6?id=442759166>> | Reset PIN
<<https://mysettings.lync.com/pstnconferencing>>

By participating in EPA hosted virtual meetings and events, you are consenting to abide by the agency's terms of use. In addition, you acknowledge that content you post may be collected and used in support of FOIA and eDiscovery activities.

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From: [Matuszko Jan](#)
To: [Fugh Justina](#)
Subject: RE: I've returned your annual report to you (finally)
Date: Tuesday, August 17, 2021 2:35:23 PM

Hi Justina,

I am not a finance person and I don't deal with any of this except to fill out this form so I really appreciate your help. I am back from vacation and have updated the form per your request.

Regarding (b) (6), my husband and I looked them up since we had no idea what they do (we have a financial advisor that handles this):

(b) (6)

EFED only conducts assessments for conventional pesticides. Seems to me I should easily be able to recuse myself from any matters related to this company. Then again, I don't understand all of the legal in and outs here....

Jan

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Monday, August 9, 2021 12:09 AM
To: Matuszko, Jan <Matuszko.Jan@epa.gov>
Subject: I've returned your annual report to you (finally)

Hi Jan,

I've reviewed your financial disclosure report and returned it for some technical corrections. But you will also see in the comments (also set forth below) that I am raising a concern about financial conflicts of interest. As an employee of OPP, you are subject to the EPA supplemental regulations at 5 CFR 6401.102(a)(2) that prohibits you from owning any stock or other financial interest in "companies that manufacture or provide wholesale distribution of pesticide products registered by the EPA. These restrictions apply to companies with subsidiaries in these areas but do not include retail distributors to the general public." Of the assets that you currently own (b) (6) is a current EPA registrant. We need to understand more clearly what you work on, so I'll set up a meeting to discuss further. In the meantime, let's get your financial disclosure report completed. Please see the comments below, particularly the highlighted section:

Comments of Reviewing Officials (not publicly displayed on report):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(08/08/21, Fugh, Justina): Hi -- In reviewing your report, I have adjusted most of the EIF entries. You have two primary choices under EIF: yes (meaning the item is an excepted investment fund), and N/A (meaning that there are no underlying assets that have to be reported). So stocks, options, corp bonds, money market accounts, sweep accounts will all have "N/A" under EIF, never "no." When do you use "no?" Just for a header. I made the corrections for you. Please look at the comments regarding how you've reported (b) (6), and make the necessary changes. Now for the more substantive issues. OGC/Ethics does not have access to the OPP registrant files, so we cannot easily ascertain whether any of the companies in which you/your spouse are invested either manufacture or provide wholesale distribution of pesticides that are registered by EPA. In your position, you are prohibited by 5 CFR 6401.102(a)(2) from owning any such stock: "Employees in the Office of Pesticide Programs are prohibited from having outside employment with or holding stock or any other financial interest in companies that manufacture or provide wholesale distribution of pesticide products registered by the EPA. These restrictions apply to companies with subsidiaries in these areas but do not include retail distributors to the general public." We consulted with OPP's ethics officials and ascertained that (b) (6) does have registrations, so we need to talk about that asset and how to resolve the conflict. But first, let's finalize the report by getting your spouse's information entered correctly.
5.		(b) (6)	(07/21/21, Fugh, Justina): You are required to provide the name of your (b) (6)

[REDACTED] (b) (6)

5. [REDACTED] (b) (6) (07/21/21, Fugh, Justina): For this item, you need to provide the (b) (6)
[REDACTED]
[REDACTED] My guess is that you erred in adding the description, right?

5. [REDACTED] (b) (6)
[REDACTED] (08/08/21, Fugh, Justina): (b) (6) ? If so, then the EIF entry should be "N/A" not "yes."
[REDACTED]
[REDACTED]

5. [REDACTED] (b) (6)
[REDACTED] (08/08/21, Fugh, Justina): You had "no" for EIF, but this is definitely a (b) (6)
[REDACTED]

5. [REDACTED] (b) (6)
[REDACTED] (08/08/21, Fugh, Justina): isn't this (b) (6) If so, then EIF entry should be N/A, not yes.
[REDACTED]
[REDACTED]

Justina
Justina Fugh (she/her) | Director Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North William Jefferson Clinton Federal Building | Washington DC 20460 (for ground deliveries use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Matuszko, Jan](#)
To: [Fugh, Justina](#)
Cc: [Theriault, Alberta \(Carla\)](#); [Jewell, Shannon](#)
Subject: RE: OPP public filer
Date: Thursday, July 22, 2021 10:33:39 AM

Got it. I will stand by.

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Thursday, July 22, 2021 10:33 AM
To: Matuszko, Jan <Matuszko.Jan@epa.gov>
Cc: Theriault, Alberta (Carla) <Theriault.Carla@epa.gov>; Jewell, Shannon <jewell.shannon@epa.gov>
Subject: RE: OPP public filer

Sorry, Jan, I didn't intentionally include you on the email. I promise that I would have been less cryptic had I written to you directly! I actually have no idea whether those companies have pesticides at all, which is why I have to ask Carla and Shannon!

But since you're part of the chain now, the concern I have is that your ownership levels mean you can't work on any matters of general applicability involving pesticide manufacturers, including setting policy. Now, it may be that your work in EFED doesn't involve matters of general applicability, but at a minimum, the recusal statement that you've got is insufficient given your conflicts. Let me wait to hear what Carla and Shannon have to say, then I'll set up time to talk to you.

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Matuszko, Jan <Matuszko.Jan@epa.gov>
Sent: Thursday, July 22, 2021 10:25 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>; Theriault, Alberta (Carla) <Theriault.Carla@epa.gov>; Jewell, Shannon <jewell.shannon@epa.gov>
Subject: RE: OPP public filer

Thanks. Here is my recusal letter for (b) (6) as they were flagged previously. Are you saying that all of the companies on that list have pesticides? Are they conventional pesticides? I ask because it was easy to recuse myself from (b) (6) because they deal in pesticides that are handled by AD (and for which EFED has not equities).

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Thursday, July 22, 2021 10:18 AM
To: Theriault, Alberta (Carla) <Theriault.Carla@epa.gov>; Jewell, Shannon <jewell.shannon@epa.gov>
Cc: Matuszko, Jan <Matuszko.Jan@epa.gov>
Subject: RE: OPP public filer

Thanks! It's Jan Matuszko:

(b) (6)

(b) (6)	

From: Theriault, Alberta (Carla) <Theriault.Carla@epa.gov>

Sent: Thursday, July 22, 2021 8:04 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>; Jewell, Shannon <jewell.shannon@epa.gov>

Subject: RE: OPP public filer

Good morning Justina,

If you would like to send us the company in question and the person's name we can check on both, just in case we may have something on file for them.

Many thanks,

Carla

Carla Theriault · (703)-347-8568 · theriault.carla@epa.gov

EPA Office of Pesticide Programs Immediate Office

From: Fugh, Justina <Fugh.Justina@epa.gov>

Sent: Wednesday, July 21, 2021 10:50 PM

To: Jewell, Shannon <jewell.shannon@epa.gov>; Theriault, Alberta (Carla)

<Theriault.Carla@epa.gov>

Subject: OPP public filer

Hi there,

As you know, OPP employees are prohibited by 5 CFR 6401.102(a)(2) from owning stock in "companies that manufacture or provide wholesale distribution of pesticide products registered by the EPA. These restrictions apply to companies with subsidiaries in these areas but do not include retail distributors to the general public." I am reviewing a 278 for an OPP person who is acting in an SES position, and I'm concerned that some of the assets may involve prohibited stocks. If I gave you a list of the possible problem children, could you check to see whether they registrants? Or would it be easier if I told you the name of the person so you could see if you've ever looked into the assets when the person filed a 450?

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MEMORANDUM

SUBJECT: Recusal from Participation in Matters Affecting (b) (6)
(b) (6)

FROM: Jan Matuszko, Deputy Director EFED *Jan Matuszko*

TO: Marietta Echeverria, Director EFED

DATE: March 31, 2020

To avoid any real or apparent conflict of interest, I hereby recuse myself from participating in any particular matter or matter of general applicability – including deliberations, decisions, regulations, policy making, and similar actions – that will have a direct and predictable effect on the financial interests of (b) (6)
(b) (6)

cc: Richard Keigwin, Deputy Ethics Official
Office of Pesticide Programs

Debby Sisco, Assistant Deputy Ethics Official

(b) (6)

1) Finalizing your financial disclosure report

- (b) (6), (b) (3) (A)
-
-
-
-
-
-
-
-

- We have identified the assets that present conflicts (see below) but we don't know what you work on to ascertain whether you have any actual conflicts
- We can't recommend any remedy until we know where the conflicts arise
- How long have you worked in OPP? Are you aware that you are subject to the EPA supplemental regulation at 5 CFR 6401.102 that prohibits you from having outside employment in AND in holding any stock or other financial interest in any company that manufactures or provides wholesale distribution of pesticide products registered by the EPA? These restrictions apply to companies with subsidiaries in these areas but do not include retail distributors to the general public.
- You currently own (b) (6), which is a registrant.
- Here are your financial conflicts of interest:

[illegible]

[illegible]

3) Do you have a recusal statement already?

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Matuszko, Jan](#)
To: [Fugh, Justina](#)
Subject: RE: Question on Annual Integrity Report
Date: Monday, May 9, 2022 6:19:46 AM

Good morning,
Just putting this at the top of your in-box.
Thanks!
Jan

From: Matuszko, Jan
Sent: Tuesday, May 3, 2022 12:15 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Annual Integrity Report

Hi Justina,

I thought I should check in with you BEFORE I start my report this year. I recall you mentioned we needed to report the value of the stock as of the end of the calendar year (in this case 2021) vs the value of the stock today. Do I have that right?

Also, it pre-populated my report. As I have been also providing periodic reports, does it pick those up and include those too or is it just what I entered last year?

Thanks!

Jan

From: [Matuszko, Jan](#)
To: [Fugh, Justina](#); [Sisco, Debby](#)
Cc: [Jewell, Shannon](#); [Theriault, Alberta \(Carla\)](#)
Subject: RE: Quick question re 278 filing requirement
Date: Wednesday, July 29, 2020 6:26:06 PM

Thanks Justina and Debby. This is very helpful! I expect I will be in this position at least 60 days so go ahead and assign the report to me.

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Wednesday, July 29, 2020 6:14 PM
To: Matuszko, Jan <Matuszko.Jan@epa.gov>; Sisco, Debby <Sisco.Debby@epa.gov>
Cc: Jewell, Shannon <jewell.shannon@epa.gov>; Theriault, Alberta (Carla) <Theriault.Carla@epa.gov>
Subject: RE: Quick question re 278 filing requirement

Hi Jan,

The personnel action may have you in the position for 120 days or less, but that's not determinative. Under the Ethics In Government Act, any person who is acting for more than 60 days in a position that has been designated to file a public financial disclosure (such as any SES position) is required to file the OGE 278. It doesn't matter that you're still in the GS or not. If you will serve for more than 60 days in CY 2020, then you are required by law to comply (and, worse still, we can assess late filing fees).

Typically, HR notifies me two weeks after they do the paperwork, so I can tell you that they have not yet processed yours. When they do, they may backdate the effective date. So you can wait until I'm officially notified, or I can assign you the report now.

The important thing to know is that there is no escaping the filing requirement if you will be in the position for more than 60 days.

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Matuszko, Jan
Sent: Wednesday, July 29, 2020 5:38 PM
To: Sisco, Debby <Sisco.Debby@epa.gov>; Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Jewell, Shannon <jewell.shannon@epa.gov>; Theriault, Alberta (Carla) <Theriault.Carla@epa.gov>
Subject: RE: Quick question re 278 filing requirement

A bit more information:

The plan is for me to act long enough to allow OPP to go through the talent hub process and select someone for a one year detail. I was told that would not exceed 120 days. While I am acting in an SES position, I remain a GS-15.

From: Sisco, Debby <Sisco.Debby@epa.gov>
Sent: Wednesday, July 29, 2020 5:31 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Matuszko, Jan <Matuszko.Jan@epa.gov>; Jewell, Shannon <jewell.shannon@epa.gov>; Theriault,

Alberta (Carla) <Therault.Carla@epa.gov>

Subject: Quick question re 278 filing requirement

Jan Matuszko is serving as acting director (an SES level position), but I don't know for how long and I can't remember at what point she would be required to file a 278. Is it 60 days?

Debby Sisco

Ethics Officer and Special Assistant to the Director

I am now working half-time, teleworking on Tuesdays and Wednesdays and for a half day on Thursdays. My desk phone is forwarded to my EPA cell.

Office of Pesticide Programs (7501P)

US Environmental Protection Agency

4th floor - 4241 Potomac Yard South

(office: 703 308-8121; Mobile: 571 317-4823)

From: Messina, Edward <Messina.Edward@epa.gov>

Sent: Friday, July 17, 2020 1:32 PM

To: OPP ALL <OPP_ALL@epa.gov>

Subject: OPP Leadership Changes

Dear OPP,

With Marietta Echeverria's move to serve as the Acting Director of the Registration Division, I am pleased to announce that I have asked **Jan Matuszko to serve as the Acting Director of the Environmental Fate and Effects Division (EFED)**, starting **July 20th**. A Talent Hub announcement for the EFED Acting Division Director competitive detail has recently been announced.

Jan currently serves as the Deputy Director of EFED, where she oversees development of ecological risk assessments, assessments of drinking water in support of human health risk assessment and endangered species assessments for conventional pesticide registration and registration review programs. Prior to joining EFED, Jan served as a project engineer, team lead, senior engineer (GS-15), and Branch Chief in the Engineering and Analysis Division in the Office of Water and was responsible for producing new and revised national best available technology-based standards (effluent guidelines) for the control of effluent discharges from industrial sources. As a Branch Chief, she also oversaw the statutorily required annual review of existing effluent guidelines and EPA's Clean Water Act (CWA) Methods program which codifies laboratory analytical methods, or test procedures, that are used to analyze components of wastewater and other environmental samples required by the CWA. Prior to joining EPA, Jan worked for the Naval Research Laboratory where she conducted various investigations in support of Navy and Army programs for hazardous chemical, biological, and radiological defense. Jan has received a B.S. in Chemical Engineering and an M.S. in Civil

Engineering (Environmental) from Virginia Tech.

Please join me in welcoming Jan and wishing her well in her new acting position.

Ed

Ed Messina, Esq.

Acting Office Director

Office of Pesticide Programs

Office of Chemical Safety & Pollution Prevention

U.S. Environmental Protection Agency

Washington, D.C.

p: (703) 347-0209

From: [Fugh, Justina](#)
To: [Matuszko, Jan](#)
Cc: [ethics](#)
Subject: RE: Request for extension to complete annual financial disclosure report
Date: Wednesday, May 11, 2022 6:58:00 PM

The legal authority is found in the Ethics In Government Act, 5 U.S.C. app., specifically § 101, and in the implementing ethics regulations at 5 C.F.R. § 2634.201.

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Matuszko, Jan <Matuszko.Jan@epa.gov>

Sent: Wednesday, May 11, 2022 6:46 PM

To: ethics <ethics@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: Request for extension to complete annual financial disclosure report

Can you please also show me the requirement where someone who is a GS-15 Acting in an SES position must provide this information. Thanks!

From: ethics <ethics@epa.gov>

Sent: Wednesday, May 11, 2022 1:20 PM

To: Matuszko, Jan <Matuszko.Jan@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: Request for extension to complete annual financial disclosure report

Hello, we can grant you a 45-day extension. Your new due date will be June 30. Yes, your report covers calendar year 2021, so your year-end brokerage statements should have the necessary information.

Sincerely, Ferne

Ferne L. Mosley, Attorney-Advisor

Office of the General Counsel/Ethics Office

U.S. Environmental Protection Agency

1200 Pennsylvania Ave, NW WJC Bldg, (North)

Washington, DC 20460

202-306-2998 (mobile)

202-564-8046 (desk)

From: Matuszko, Jan <Matuszko.Jan@epa.gov>

Sent: Wednesday, May 11, 2022 1:18 PM

To: ethics <ethics@epa.gov>

Cc: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: Request for extension to complete annual financial disclosure report

Hello,

My husband and I have (b) (6). I've sent a couple of questions regarding completing the report and am awaiting a response. I am seeking an extension under the assumption that we need to provide information for our holdings as of December 31, 2021 including what it was worth at the time. I have been (b) (6)

I need the additional time to work with my husband and our financial advisor to get the

backdated info.

If I can simply provide information regarding our holding and their worth now, then I can meet the deadline.

Please advise.

Thanks!

Jan

+++++

Jan Matuszko, Acting Director

Environmental Fate and Effects Division

Office of Pesticide Programs

From: [Fugh, Justina](#)
To: [Anderson, Neil](#)
Subject: RE: even if you're not still in the acting position....
Date: Wednesday, July 13, 2022 11:31:00 AM

Hi,

Alas, yes, you must file the public financial disclosure report. It doesn't matter that you're not SES, that you were on detail, that you may have asked OGC/ethics or your boss about when you would be hit with this filing requirement, or that you filed the 450 instead. Because you occupied an SES position for more than 60 days in a calendar year, you're captured under this reporting obligation. Plus, you're sadly a victim of the fact that my office, along with the Shared Services Center, is woefully over-committed, so we just can't turn our attention timely to this filing requirement. We should have notified you earlier, but we just didn't, but we also can't waive or ignore the statutory requirement. I am sorry, sincerely. What I can do, though, is to waive the late filing fees.

You have one filing obligation now and, because the detail ended (which the SSC still hasn't told me about formally), you will also have to file a termination report. For the new entrant report, I've given you the maximum extension already, which was 90 days. That put your deadline as 5/16/22.

Obviously, you can't meet that deadline because we didn't even tell you about it until July! For people like you (because you are not alone in being saddled with this late notification), I've suggested submitting the new entrant report at the end of August. The complicating factor for you, though, is that you indicate that your detail ended in mid May. I haven't been notified about that formally, so do you have a date when that occurred?

While it may seem horrible to assign to you a second filing obligation, I will have to do just that because you have a statutory obligation to also file a termination report. Please don't fret. You'll work on the new entrant report first, and then the termination report will be easier to complete since you'll be able to upload the information from your new entrant report. You will have two additional sections (transactions and gifts) that you don't see in the new entrant report. This all to say that I can still give you until the end of August to complete the new entrant report, and then you can turn your attention to the termination report. When you get grumpy messages from INTEGRITY about being late and being fined, just remember that I have supergirl powers and can waive the late fees so long as you are not unreasonably tardy in submitting now that you know about the obligation.

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 | phone 202-564-1786

From: Anderson, Neil <Anderson.Neil@epa.gov>
Sent: Tuesday, July 12, 2022 8:54 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: even if you're not still in the acting position....

Hi Justina. Ugh... I will work on this. I was in the detail from about mid-January to mid-May. What is the timing for when I need to complete this?

From: Fugh, Justina <Fugh.Justina@epa.gov>
Sent: Monday, July 11, 2022 9:58 PM
To: Anderson, Neil <Anderson.Neil@epa.gov>

Subject: even if you're not still in the acting position....

You have this reporting obligation. It seems that Anne Overstreet is now acting, but you will still have to file this new entrant report. Once we've certified it, we'll assign you the termination report to close out this vexing obligation. Sorry about this.

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 | phone 202-564-1786

From: Fugh, Justina

Sent: Monday, July 11, 2022 8:36 PM

To: Anderson, Neil <Anderson.Neil@epa.gov>

Subject: Hello from EPA Ethics (but, just wait, it gets worse)

Hi there,

I'm very sorry to be the bearer of aggravating news, but I understand that you have been detailed into an SES position since (gulp) 1/16/22. You should have been informed at the beginning of the year that you are required to file the public financial disclosure report as a new entrant within 30 days of starting that detail. We didn't inform you, but now that we know, well, we have to make you go back and do the paperwork. We haven't seen any paperwork terminating your detail, so we must assume that you've served in the acting position for more than 60 days. Consequently, I can't waive your filing requirement, which is statutory and applies even though you are still a GS employee.

THE FINANCIAL DISCLOSURE REPORT, OGE-278e

EPA uses an electronic filing system (www.INTEGRITY.gov) for the public financial disclosure reports that is operated and secured by the U.S. Office of Government Ethics (OGE). You are required by law to complete the form, and we will use it to determine whether you have any financial conflicts of interest or other ethics concerns. We created an account for you in INTEGRITY and have assigned you a "new entrant" report. Your filer category is "career SES" and your filer status is "other" because you're on detail. For help in INTEGRITY, check out the OGE [Public Financial Disclosure Guide](#). The email from INTEGRITY.gov will provide you with specific instructions to log into the federal government's max.gov site, the gateway to INTEGRITY. If you don't receive your account notification, then please check your clutter box for messages from INTEGRITY.gov or go directly to www.INTEGRITY.gov and contact their help desk.

There are several important things to know about the OGE-278e: (1) it is a public form (which means that anyone can ask for a copy of your form, and we must provide it, even without your prior permission); (2) you have to fill it out every year you are in this position; and (3) when you leave the acting position, you have to file a termination report (so remember to notify us). There is also a late filing fee of \$200 but I'll of course waive that provided you aren't unreasonably tardy in filing now that you know about the requirement. That said, there are also civil and criminal penalties for failure to file at all or for inaccurate reporting.

YOUR REPORTING PERIODS FOR THE NEW ENTRANT REPORT

For the New Entrant (NE) report, you will complete the sections in RED below and apply the following reporting periods:

PART	TITLE	REPORTING PERIOD
1	Filer's Positions Held Outside United States Government	Preceding Two Calendar Years to Filing Date

2	Filer's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year to Filing Date*
3	Filer's Employment Agreements and Arrangements	As of Filing Date
4	Filer's Sources of Compensation Exceeding \$5,000 in a Year	Preceding Two Calendar Years to Filing Date
5	Spouse's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year to Filing Date*
6	Other Assets and Income	Preceding Calendar Year to Filing Date*
7	Transactions	Not applicable for the NE report
8	Liabilities	Preceding Calendar Year to Filing Date*
9	Gifts and Travel Reimbursements	Not applicable for the NE report

*For example, if today is March 3, 2021, the reporting period would run from January 1, 2020, to March 3, 2021. When valuing assets and liabilities, you may choose any date that is fewer than 31 days before the filing date.

ANSWER ANY FOLLOW UP QUESTIONS WITHIN 14 DAYS

We will review your report as quickly as possible. If we have any questions, then we will notify you. At that point, you will have 14 calendar days to respond and resubmit your report back to us with any necessary changes.

REPORTING TRANSACTIONS

By law, as soon as you started this detail (on 1/16/22), you were considered a public financial disclosure filer who is subject to the Ethics In Government Act, as amended by the STOCK Act. Not only must you report a lot more information than you had to on your confidential report, but now you are also required to report any purchase, sale or exchange of stocks, bonds, commodities futures or other forms of securities when the amount of the transaction exceeds \$1000. You will have to use INTEGRITY to disclose reportable transactions within 30 days of receiving notification of the transaction, but not later than 45 days after the transaction occurs. You will have to report transactions that occur within brokerage accounts, managed accounts, or other investment vehicles that you own or jointly own with your spouse or another person, as well as transactions of your spouse or dependent children. For a comprehensive review of reportable transactions, see [EPA Ethics Advisory 2012-03](#) and our revised attached chart. Remember, you are responsible for reporting transactions, even if you have a managed account, and you will be fined for a tardy periodic transaction report going forward. If you had any transactions that should have been reported between 1/16/22 and today, then you will still have to report them, but you will not be fined for those "tardy" transaction reports.

HELPFUL HINTS FOR FILLING OUT THE FORM

- This is a wretched and exacting form, so just know that you will have to report way more information that you did on the confidential financial disclosure report.
- You will get three different places to report assets: filer's employment-related assets and income, spouse's employment related assets and income, and other assets and income. So you are reporting the assets for yourself, your spouse and your dependent children. We don't really care where you report your assets, just that you

do report them all someplace.

- You must include any investment asset that is worth more than \$1000. Include any income from any source that exceeded \$200 during the reporting period (including outside jobs or hobbies, rental income). Include any cash/savings accounts that have more than \$5000.
- Enter each asset separately. Don't lump items together on one line. Be sure to provide the valuation of the asset AND the amount of the income. For assets that aren't mutual funds, you also have to report the type of income (e.g., dividends, cap gains).
- For 401(k) or IRA plans, provide the name of each of the underlying assets. Don't just write "Vanguard IRA" or "mutual fund." You must specify each asset separately and give the valuation but, for these assets in tax deferred instruments, you do not need to provide the amount of income accrued.
- Do not report your federal salary, your spouse's federal salary, or Thrift Savings Plan information
- If you (not your spouse) have any earned income (e.g., outside job, paid pension), you have to report the actual amount of that income.
- If your spouse works outside of federal service, then include your spouse's employer but not the amount of your spouse's salary. If you are not legally married, do not report your significant other's employer.
- Don't forget to include any life insurance policies (whole life or variable life) as well as the underlying investments, but do not report term life insurance.
- If you have nothing to report in a section, be sure to click the "nothing to report" button.
- Remember to check out the Office of Government Ethics' [Public Financial Disclosure Guide](#) or to contact OGC/Ethics for help.

OTHER ETHICS REQUIREMENTS FOR YOU

HATCH ACT

Because you are still a GS employee, you will remain "less restricted" under the Hatch Act. You should familiarize yourself with the Hatch Act as it affects you, and from the EPA intranet, can gain a good overview by reviewing our online [Hatch Act training course](#) or by referring to our attached handy chart that reminds you of your restrictions.

ETHICS TRAINING

As a public financial disclosure filer, you must take one hour of ethics training this year. Again, I'm very sorry for this irritating news. If you have any questions regarding this message or your obligations, then please contact me directly.

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 | phone 202-564-1786

When to Report Transactions

DUE DATE: The earlier of the following: 30 Days from Notification or 45 Days from Transaction

	Periodic Transaction Report	Annual and/or Termination Report
Investment Assets	Report on the OGE 278-T?	Report on Part 7 of the OGE 278e?
Transactions of \$1,000 or less		
• Any asset in which the transaction amount is \$1,000 or less regardless of the type of asset or who owns the asset	No	No
Your investment assets (or jointly held)		
• Your stocks	Yes	Yes
• Your bonds (except U.S. Treasury securities)	Yes	Yes
• Your commodity futures	Yes	Yes
• Your other investment securities	Yes	Yes
• Assets listed above in your (joint) brokerage accounts, (joint) managed accounts, IRAs, other retirement accounts, and/or other (joint) investment vehicles	Yes	Yes
Your spouse's investment assets		
• Spouse's stocks	Yes	Yes
• Spouse's bonds (except U.S. Treasury securities)	Yes	Yes
• Spouse's commodity futures	Yes	Yes
• Spouse's other investment securities	Yes	Yes
• Assets listed above in spouse's <u>own</u> brokerage account, managed accounts, IRAs, other retirement accounts, and/or other investment vehicles	Yes	Yes
Your dependent child's investment assets		
• Dependent child's stocks	Yes	Yes
• Dependent child's bonds (except U.S. Treasury securities)	Yes	Yes
• Dependent child's commodity futures	Yes	Yes
• Dependent child's other investment securities	Yes	Yes
• Assets listed above in dependent child's <u>own</u> brokerage account, IRAs, and/or other investment vehicles	Yes	Yes
Other investment assets irrespective of ownership		
• Real Property	No	Yes ¹
• Mutual funds, exchange traded funds, index funds and/or other "excepted investment funds" ²	No	Yes
• Any asset in which the transaction amount is \$1,000 or less	No	No
• Cash accounts (deposits and/or withdrawals)	No	No
• Money market accounts	No	No
• Money market funds	No	No
• Certificates of deposits	No	No
• US Treasury Securities (e.g., T bills, Treasury bonds, U.S. savings bonds)	No	No
• Federal Government Retirement Accounts (e.g., Thrift Savings Plan)	No	No
• Life insurance and annuities	No	No
• Collectibles	No	No
• Assets held within an excepted trust ³	No	No
• Transfer of assets between you, your spouse, and your dependent children	No	No

¹ Do not report the purchase or sale of your personal residence on Part 7 unless you rent it out at any time during the reporting period.

² To be an excepted investment fund (EIF), the asset must be:

- (a) widely held (more than 100 participants),
- (b) independently managed – arranged so that you neither exercise control nor have the ability to exercise control over the financial interests held by the fund, and
- (c) publicly traded (or available) or widely diversified.

Managed accounts, investment clubs, trusts, 529 accounts, brokerage accounts, and individual retirement accounts (IRAs) are not excepted investment funds in and of themselves. It may be that individual assets held within these types of investment vehicles may qualify as EIFs if, for example, your IRA holds a publicly-traded mutual fund. But the fact that you have a managed account does not absolve you of your reporting requirements. That account is legally owned by you, and you're responsible for its assets and reporting transactions. If you have questions, contact ethics@epa.gov.

³ OGC/Ethics must determine that your trust qualifies as an “excepted trust.” For help, email ethics@epa.gov.

Political Activities and Federal Employees

The Hatch Act, enacted in 1939, was amended in 1993 and 2012. It regulates the political activities of executive branch employees, excluding the President and Vice President. The following table summarizes what political activities EPA employees can and cannot do based on their appointment. Note: Public Health Service officers must adhere to 45 CFR Part 73, Subpart F, which is most similar to the Career SES/ALJ column.

Political activity means an activity “directed toward the success or failure of a political party, a candidate for partisan political office, or a partisan political group.”

Type of Activity	PAS*	Non-Career SES, Schedule C*, Title 42, SL/ST, AD*, GS, Other	Career SES, ALJs
Personal (off premises and off duty)			
Express support for or opposition to a political candidate when off duty	Yes	Yes	Yes
Run as a partisan candidate for nomination or office in a partisan election	No	No	No
Solicit and accept contributions for your campaign in a non-partisan election	Yes	Yes	Yes
Solicit a contribution from a member of your union	N/A	Yes	N/A
Work a phone bank asking individuals to volunteer	Yes	Yes	No
Campaign on behalf of a candidate in a partisan election	Yes	Yes	No
Be active on behalf of a candidate at political rallies or meetings	Yes	Yes	No
Attend political rallies and meetings	Yes	Yes	Yes
Contribute money to political organizations	Yes	Yes	Yes
Work in non-partisan voter registration drives	Yes	Yes	Yes
Work in partisan voter registration drives	Yes	Yes	No
Register and vote	Yes	Yes	Yes
Sign a nominating petition	Yes	Yes	Yes
Distribute campaign material in a partisan election	Yes	Yes	No
Work as an election judge, poll watcher, clerical worker on election day and receive compensation for that work	Yes	Yes	Yes but nonpartisan only
Drive people to polling station on behalf of a campaign	Yes	Yes	No
Affecting Official Resources			
Use office time for political activity	Yes; IG-No	No	No
Use official space for political activity in general	Yes; IG-No	No	No
Fundraising			
Attend a political fundraiser	Yes	Yes	Yes
Solicit, accept or receive political contributions in general	No	No	No
Solicit or receive a political contribution on government premises	No	No	No
Plan or organize a political fundraiser when off duty	Yes	Yes	No
Sponsor, host, or allow your name as sponsor/host for a political fundraiser	No	No	No
Serve drinks or check coats at a political fundraiser	Yes	Yes	No
Speak at a partisan fundraiser without appealing for money	Yes	Yes	No
Allow only your name to be listed as speaker on fundraising invitation	Yes	Yes	No

*PAS = Political Appointee Confirmed by the Senate; Schedule C = political appointees not confirmed by Senate; AD = Administratively Determined; SES = Senior Executive Service

From: [Fugh, Justina](#)
To: [Anderson, Neil](#)
Subject: RE: Your financial disclosure report(s)
Date: Tuesday, July 26, 2022 12:17:00 PM

Super! I've certified your report, so you can now take care of that termination report, too.

THANKS!

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 | phone 202-564-1786

From: Anderson, Neil <Anderson.Neil@epa.gov>

Sent: Tuesday, July 26, 2022 11:43 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: Your financial disclosure report(s)

Thank you!

The name of (b) (6)

From: Fugh, Justina <Fugh.Justina@epa.gov>

Sent: Tuesday, July 26, 2022 11:19 AM

To: Anderson, Neil <Anderson.Neil@epa.gov>

Subject: RE: Your financial disclosure report(s)

Hi Neil,

I think you're close, but you still need to identify the "header" for this entry, which I gather is your (b) (6). I took a stab at the entry for you, so take a look. Just fill in the name of the employer, and I'll fix your form for you:

#	Description	EIF	Value	Income Type	Income Amount
1	(b) (6), (b) (3) (A)				
2					
3					

Thanks!

Justina

Justina Fugh (she/her) | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 | phone 202-564-1786

From: Anderson, Neil <Anderson.Neil@epa.gov>

Sent: Tuesday, July 26, 2022 10:23 AM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: RE: Your financial disclosure report(s)

Hi Justina. I'm working on it right now so I'm glad you just sent this. I think I've made the appropriate changes to the items in Part 6 based on your comments.

However, for the comment on Part 5 I was a bit uncertain but took a stab at it. I've modified the original entry (b) (6)

Is that the correct way to do it?

I re-signed the form and submitted again for your review.

Thanks,

Neil

From: Fugh, Justina <Fugh.Justina@epa.gov>

Sent: Tuesday, July 26, 2022 9:57 AM

To: Anderson, Neil <Anderson.Neil@epa.gov>

Subject: Your financial disclosure report(s)

Hi there,

Thanks for tackling your new entrant report, but I'm afraid that I had to return it to you for edits:

Comments of Reviewing Officials (not publicly displayed on report):

PART	#	REFERENCE	COMMENT
1	1	(b) (6), (b) (3) (A)	
1	2		
1	3		
1	4		
1	5		
1	6		
1	7		
1	8		
1	9		
1	10		

I have also learned that your detail ended on 5/15/22, so I've also assigned you a termination report. Don't start that until after we certify your new entrant report. That way, you'll be able to upload the information from that report to save you time.

Let me know if you have any questions!

Justina

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